

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, JANE HAMILTON,)
SERGIO DELEON, FLOYD J. CARRIER,)
ANNA BURNS, MICHAEL MONTEZ,)
PENNY POPE, OSCAR ORTIZ, KOBY)
OZIAS, JOHN MELLOR-CRUMLEY, PEGGY)
HERMAN, EVELYN BRICKNER, GORDON)
BENJAMIN, KEN GANDY, LEAGUE OF)
UNITED LATIN AMERICAN CITIZENS)
(LULAC), AND DALLAS COUNTY, TEXAS,)

Plaintiffs,)

v.)

RICK PERRY, Governor of Texas; and JOHN)
STEEN, Texas Secretary of State,)

Defendants.)

UNITED STATES OF AMERICA,)

Plaintiffs,)

TEXAS LEAGUE OF YOUNG VOTERS)
EDUCATION FUND AND IMANI CLARK,)

Plaintiff-Intervenors,)

TEXAS ASSOCIATION OF HISPANIC)
COUNTY JUDGES AND COUNTY)
COMMISSIONERS, AND HIDALGO)
COUNTY et al,)

Plaintiff-Intervenors,)

v.)

STATE OF TEXAS, JOHN STEEN, in his)
official capacity as Texas Secretary of State;)
and STEVE McCRAW, in his official capacity)
as Director of the Texas Department of Public)
Safety,)

Defendants.)

CIVIL ACTION NO.
2:13-CV-193 (NGR)
[Lead case]

CIVIL ACTION NO.
2:13-CV-263 (NGR)
[Consolidated case]

TEXAS STATE CONFERENCE OF NAACP)	
BRANCHES; and the MEXICAN)	
AMERICAN LEGISLATIVE CAUCUS OF)	
THE TEXAS HOUSE OF)	
REPRESENTATIVES,)	
<i>Plaintiffs,</i>)	
v.)	
)	CIVIL ACTION NO.
JOHN STEEN, in his official capacity as)	2:13-CV-291 (NGR)
Secretary of State of Texas; and STEVE)	[Consolidated case]
McCRAW, in his official capacity as Director)	
of the Texas Department of Public Safety,)	
<i>Defendants.</i>)	
<hr/>)	
BELINDA ORTIZ, LENARD TAYLOR,)	
EULALIO MENDEZ JR., LIONEL)	
ESTRADA; ESTELA GARCIA ESPINOSA,)	
LYDIA LARA, MARGARITO MARTINEZ)	
LARA, MAXIMINA MARTINEZ LARA, AND)	
<i>LA UNION DEL PUEBLO ENTERO, INC.</i>)	
<i>Plaintiffs,</i>)	
v.)	CIVIL ACTION NO.
)	2:13-CV-348 (NGR)
STATE OF TEXAS, JOHN STEEN, in his)	[Consolidated case]
official capacity as Texas Secretary of State;)	
and STEVE McCRAW, in his official capacity)	
as Director of the Texas Department of Public)	
Safety,)	
<i>Defendants.</i>)	
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**DEFENDANTS' UNOPPOSED MOTION TO FILE ADVISORY IN EXCESS
OF TEN PAGES**

Defendants respectfully request leave to file an Advisory in excess of ten pages, regarding the United States' Motion For a Protective Order from Defendants' Rule 30(b)(6) Notice of Deposition to the United States of America. (Docket No.

276.) The Advisory has sixteen pages in its body, which is comparable to the United States' Motion for a Protective Order, which had fifteen pages in its body. Since the Meet-and-Confer process has not yielded a single topic on which the United States will consent to deposition testimony, a longer response was necessary to address the United States' objections to 28 Topics in the 30(b)(6) Notice,¹ as well as the legal authority in support of deposition testimony on those Topics.

Counsel for the Plaintiff United States (Ms. Anna Baldwin) has consented to the relief sought in this motion.

Dated: June 30, 2014

Respectfully submitted,

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¹ As defined in the Defendants' Advisory.

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COUNSEL FOR THE STATE OF TEXAS, RICK
PERRY, JOHN STEEN, and STEVE MCCRAW

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2014, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Lindsey Elizabeth Wolf
LINDSEY ELIZABETH WOLF